

U.S. Appln. No. 09/715,453
Amendment Dated Jan. 13, 2006
Reply to Office Action of Aug. 12, 2005
Docket No. 6169-134

IBM Docket No. BOC9-1999-0074

REMARKS/ARGUMENTS

These remarks are submitted responsive to the final office action dated August 12, 2005 (hereinafter Office Action). The remarks are made in conjunction with the claim amendments presented herein and with the filing of Applicants' Request for Continued Examination (hereinafter RCE). This response is filed after the 3-month shortened statutory period, and as such, a retroactive extension of time is hereby requested. The Examiner is authorized to charge the appropriate extension fee and RCE fee to Deposit Account 50-0951.

In the Office Action, Claims 1 and 32 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter Applicants regard as their invention. Claims 1, 2, 7, 14-20, 22, 32-33, 38, and 45-51 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Published Patent Application No. 2002/0178232 to Ferguson (hereinafter Ferguson). Claims 5, 6, 8, 21, 24, 25, 36, 37, 39 and 52 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ferguson in view of U.S. Patent No. 5,918,013 to Mighdoll, *et al.* (hereinafter Mighdoll). Claims 9, 26 and 40 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ferguson in view of U.S. Patent No. 6,601,091 to Spilo (hereinafter Spilo). Claims 10, 11, 13, 41, 42 and 44 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ferguson in view of U.S. Patent No. 6,119,135 to Helfman (hereinafter Helfman). Claims 12 and 43 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ferguson in view of U.S. Patent No. 6,088,718 to Altschuler, *et al.* (hereinafter Altschuler). Lastly, Claims 3, 4, 23, 34 and 35 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ferguson.

Applicants have amended each of independent Claims 1, 22, and 32 to emphasize certain aspects of their invention. Each of dependent Claims 12 and 43 have been cancelled. The claim amendments also alter the grammar that was the basis of the rejection of Claims 1 and 32 under 35 U.S.C. § 112, second paragraph. The claim

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amendments are supported throughout the Specification. (See, e.g., Specification, p. 17, line 25 – p. 18, line 3.) No new matter has been introduced by virtue of the amendments or newly-presented claim.

I. Applicants' Invention

It may be useful to reiterate certain aspects of Applicants' invention prior to addressing the cited references. One embodiment of the invention, typified by independent Claim 1, as amended, is a method of presenting hypermedia content. The method can include presenting hypermedia content to a user, the hypermedia content containing hyperlinks to additional hypermedia content. The method can further include storing user selected hyperlinks in a delayed viewing list in response to a user selecting one or more of the hyperlinks.

The method can additionally include caching hypermedia content associated with the stored hyperlinks during the presenting step. The hypermedia content, moreover, can be presented to the user during the storing and caching steps. Additionally, the method can include organizing cached hypermedia content into a series of topic folders corresponding to different topics and storing entries from the delayed viewing list entries in the series of topic folder. (See, e.g., Specification, p. 17, lines 25-28.) Accordingly, each stored entry from the delayed viewing list can be stored in a topic folder containing hypermedia content with which the particular stored list entry is associated. (See, e.g., Specification, p. 18, lines 1-3.)

A hypermedia content presentation system, according to another embodiment typified by amended Claim 22, can include a delayed view list manager that comprises a create-topic folder function for organizing cached hypermedia content into a series of topic folders corresponding to different topics. The delayed view list manager can further include an add function for adding delayed viewing list entries to the series of topic

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folders, whereby each entry is stored in a topic folder containing hypermedia content with which the particular stored list entry is associated.

II. The Claims, As Amended, Define Over The Prior Art

As already noted, independent Claims 1, 22, and 32 were rejected as being anticipated by Ferguson. Ferguson is directed to "an advertiser-supported interactive Web accelerator." (Paragraph 0006, lines 1-5.) Ferguson's Web accelerator is intended for "maximizing the use of available bandwidth while browsing the World Wide Web section of the Internet" by allowing a user to dynamically "pre-select content to be viewed next." (Paragraph 0006, lines 1-5; see also Abstract.)

Applicants respectfully assert that Ferguson fails to expressly or inherently teach every feature recited in independent Claims 1, 22, and 32, as amended. For example, as noted at page 11 of the Office Action, Ferguson does not teach "establishing a set of folders having an associated topic" or "downloading [the] hypermedia content to selected ones of [the] set of folders." It is further stated at pages 11-12 of the Office Action, though, that similar features are found in Altschuler.

Altschuler is directed to a using resource transition probability models for pre-fetching resources, editing a resource link topology, and building resource link topology templates. (See Col. 7, lines 23-29.) An aspect of Altschuler's described model building, noted at page 12 the Office Action, is "dimension reduction of resources," the dimension reduction being accomplished by "classifying of resources into one or more categories or 'attributes,'" such as classifying resources on how to photograph stars to include photography and/or science.

The quoted portion of Altschuler, however, describes only a categorized identification resources. Altschuler's classification of resources, however, does not teach or suggest either a method or a delayed view list manager for organizing cached hypermedia content into a series of topic folders corresponding to different topics, as

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recited in each of the amended independent claims. More fundamentally, Altschuler does not contemplate hyperlinks, let alone storing user-selected hyperlinks in a delayed viewing list. It follows that Altschuler's categorization of resources suggests nothing about storing delayed viewing list entries of hyperlinks in a series of topic folders.

Although in the Office Action Ferguson is read as teaching the caching of hypermedia content and the storing of associated hypermedia links, it is nevertheless acknowledged that Ferguson fails to teach categorizing the cached hypermedia content. But even if Altschuler is read as teaching the creating of a series of folders for categorizing such content, Altschuler yet fails to teach or suggest that each such folder further includes delayed view list entries of hyperlinks, let alone that each such list entry stored in a topic folder is associated with hypermedia content contained in the folder. Accordingly, even when combined, Ferguson and Altschuler fail to teach or suggest organizing cached hypermedia content into a series of topic folders corresponding to different topics and further storing delayed viewing list entries in each of the topic folders, such that each list entry stored is stored in a topic folder containing hypermedia content with which a stored list entry is associated.

Ferguson, even when combined with Altschuler, thus fails to teach or suggest every feature recited in amended independent Claims 1, 22, and 32. Applicants respectfully submit, therefore, that each of the independent claims, as amended, defines over the prior art. Applicants further respectfully submit that whereas the remaining dependent claims each depend from one of the amended independent claims while reciting additional features, each of the remaining dependent claims likewise defines over the prior art.

CONCLUSION

Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. The Applicants request that the Examiner call the

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undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

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